

**BIOLOGICAL RESOURCES
TECHNICAL REPORT FOR THE
SOUTH BAY POWER PLANT
ABOVE-GROUND DEMOLITION
PROJECT IN SUPPORT OF A
COASTAL DEVELOPMENT PERMIT**

Prepared for

Dynegy South Bay, LLC
990 Bay Blvd.
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Reference No. Dynegy SBPP

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List of Acronyms and Abbreviations

CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
Duke	Duke Energy North America
SBPP	South Bay Power Plant
SDG&E	San Diego Gas & Electric

SECTION 1 INTRODUCTION

This report describes biological resources on the Dynegy South Bay Power Plant (SBPP), which is located adjacent to San Diego Bay in Chula Vista, California. The SBPP ceased operations on December 31, 2010, and is now in the closure phase of the project. Under the terms of its Lease with the Port of San Diego, Dynegy is obligated to decommission and demolish the SBPP. This report addresses only the demolition of above-ground structures. The regional location of the SBPP is shown in Figure 1. Section 2 of this report describes the demolition project, including a brief description of historic conditions on the developed SBPP site. Section 3 describes existing biological resources on the SBPP site, project impacts, and recommended mitigation measures. Section 4 describes limited wetlands that are present in one small area of the site (pursuant to California Coastal Commission regulations), impacts on wetlands, and recommended mitigation measures as a result of the plant demolition. Section 5 provides literature cited in this report.

SECTION 2 PROJECT DESCRIPTION

2.1 THE PLANT SITE AND HISTORY

The SBPP, as originally constructed, included the power block, various operational and administrative buildings, the north tank farm, the south tank farm, the intake/discharge structures and channels, an operational yard, an electric power substation, and two (2) gas regulating stations. At this time, Dynegy is responsible for the demolition all of these facilities, except the electric power substation and two (2) gas regulator stations, which are still owned and operated by San Diego Gas & Electric (SDG&E). This report addresses the demolition of existing above-ground structures as well as describing the entire plant site beyond the above-ground structures in order to provide context relative to the overall plant site. A schematic diagram of the SBPP is shown in Figure 2. Figure 3 shows the portions of the SBPP that will be subject to demolition activities described fully in the CDP Application and Project Description.

The SBPP was constructed from 1958 through the early 1970's. Prior to construction of the plant, the land was largely agricultural field. Figures 4 and 5 show oblique aerial views taken on February 28, 1958 of the SBPP when it was under construction.

The plant site is fully developed and includes paved developed areas with the power block and various buildings, the developed north and south tank farms, and the remaining developed, unpaved yard on site (Figure 3). The north and south tank farms included engineered spill containment berms and substrates, tank foundations, fuel oil storage tanks, and associated distribution pipes, structures, and buildings. The north and south tank farms were maintained as barren ground during power plant operation, although regular maintenance has not occurred recently in the north tank farm since the tanks were removed from this area approximately 10 years ago. Landscape plantings, including lawn and shrub areas were developed around the main administration building and other areas. Screening berms that are either planted with ornamental species (all of Australian origin) or maintained without vegetation occur around the bayward perimeter of most of the site. Additional screen berms occur in developed, unpaved yard, and these berms have ornamental landscape plantings of Australian origin. The greater developed yard is maintained as barren ground. There is also a stormwater conveyance system constructed in uplands that includes lined, gravel, and earthen ditches, culverts, pipes, and discharge points to San Diego Bay, Telegraph Creek, and the J Street Canal.

2.2 DEMOLITION

Site demolition as addressed in this report includes removal of the power block, buildings, tanks, and other minor above-ground structures. This includes all above-

ground structures except containment and screening berms on site. At grade features, such as existing storm drains and below ground structures will not be demolished during this phase of demolition and are not addressed in this report. Demolition at the SBPP intake and discharge channels, including removal of the bridge, bridge supports and support piers, pipes, and concrete within the intake/discharge structures will not occur during this phase of demolition.

The power block is a large structure that may be demolished by several methods, including implosion, structural felling or laydown, piece demolition, and/or some combination of these methods. Demolition of other buildings and buried structures is expected to occur by traditional means using heavy equipment. Hazardous building materials, such as asbestos, will be removed prior to overall demolition. Smaller buildings and structures will be demolished using traditional methods, such as dismantling or bull dozing. A detailed description of the demolition project is provided in the Coastal Development Permit Application (CDP) by Dynegy. The perimeter screening berms and fence will remain and are not included in the project demolition.

This project involves only the demolition activities described herein for this phase of demolition. This project does not provide for future development, if any, that may occur on the project site. Future use of the site is subject to the control of the Port of San Diego, and will not involve Dynegy.

SECTION 3 BIOLOGICAL RESOURCES

3.1 ENVIRONMENTAL SETTING

The SBPP site meets the California Coastal Act definition of a “development” at Chapter 2, Section 30106 of the act as a fully developed site. The existing development is inclusive of all project features described in Sections 1 and 2 of this report. No vegetation grows in the paved portion of the site or areas developed with buildings and other material constructs. These areas do not provide regular habitat for wildlife, although birds occasionally perch, rest, or loaf on the SBPP structures and in the paved area, and other wildlife may enter also enter these areas for short periods of time. Figure 3 shows an aerial photograph of the apparent paved/built areas at the SBPP site.

Figure 6 shows the biological resources mapped on the project site. Figure 7 shows an aerial photograph of the regional area, showing developed and undeveloped lands outside of the SBPP site.

Ornamental plantings occur in landscaped portions of the SBPP site and on some of the screening berms (Figure 6). These ornamental plantings consist of landscape plants that are primarily of Australian origin. These plantings include myoporum (*Myoporum laetum*), Peruvian pepper tree (*Schinus molle*), blue gum eucalyptus (*Eucalyptus globulus*), Mexican fan palm (*Washingtonia robusta*), coral tree (*Erythrina sp.*), pink melaleuca (*Melaleuca nesophila*), paper bark tree (*Melaleuca quinquenervia*), lantana (*Lantana sp.*), star jasmine (*Trachelospermum jasminoides*), and oleander (*Nerium oleander*). There is one area in the northern portion of the property that has ornamental trees and shrubs growing in large concrete containers (Figure 6), and these large potted plants (Figure 8) are aligned to provide screening similar to that provided by the earthen berms on site. The unpaved portion of the greater developed yard is maintained as barren ground (Figure 6). Ruderal, weedy species and a few native species may temporarily colonize these areas in sparse distribution and small, sparse patches in between regular maintenance activities on site. Common temporary colonizing species on site in the unpaved developed yard include wild oat (*Avena barbata*), red foxtail brome (*Bromus madritensis spp. rubens*), Russian thistle (*Salsola tragus*), tocalote (*Centaurea melitensis*), tarragon (*Artemisia dracunculus*), white tumbleweed (*Amaranthus albus*), five-hook bassia (*Bassia hyssopifolia*), California filago (*Filago californica*), Telegraph weed (*Heterotheca grandifolia*), Canary Islands statice (*Limonium perezii*), and Algerian sea lavender (*Limonium ramosissimum*).

The unpaved developed yard does not provide suitable wildlife breeding habitat for most species, although common rodents, such as ground squirrels (*Spermophilus beecheyi*), and also cottontail rabbits (*Sylvilagus audubonii*) may occur on site. Other mammals may enter the site, but are not seen as residents. The unpaved, developed yard

provides land for avian resting or loafing. Perching and nesting by birds is possible in the ornamental plantings on the berms and potted trees and shrubs.

The south tank farm is enclosed by earthen berms and includes a relatively flat, gently sloping substrate that has been engineered with compacted soils to support fuel storage tanks, contain potential spills of fuel oil, and drain into the stormwater conveyance system. The storm drains in the containment area for each tank were closed during rainfall to prevent potential contamination of the adjacent San Diego Bay by detaining stormwater runoff. Stormwater that temporarily collected in the containment area was inspected for contaminants, particularly oils, and if found, appropriate treatment was implemented. In the absence of contaminants, the stormwater was drained to the stormwater conveyance system. The containment area would remain dry until the next rain event. Rain events in this area are usually of low magnitude and short duration, and the site was normally well drained.

The tanks are no longer in operation in the south tank farm and they have been partially removed. The containment area drains are now kept open resulting in the containment areas being well drained at all times. The south tank farm has been and continues to be maintained as barren ground. However, some sparse vegetation may temporarily colonize the unpaved portions of the south tank farm. Under normal circumstances, such vegetation is not in an area that regularly supports hydrophytes or has conditions conducive to the support of hydrophytes. The more common, albeit, sparse vegetation that may occur in the south tank farm includes five-hook bassia, white tumbleweed, crystalline iceplant (*Mesembryanthemum crystallinum*), California filago, and telegraph weed. The soils in this area are salty as a result of the proximity to San Diego Bay and the adjacent Western Salt operation. The soils are also compacted and hard.

The north tank farm is also an engineered area that is similar in construction and operation to the south tank farm. However, the tanks in this area and the underlying engineered soils (foundations) were removed in 1999-2000 in accordance with a Coastal Development Permit and accompanying CEQA Negative Declaration issued by the San Diego Unified Port District to Duke Energy North America (Duke). Duke removed the aboveground fuel oil storage tanks and engineered soils to a depth of four feet below grade, as required by the Lease Agreement with the Port. As specified in the CDP, SDG&E was responsible for ensuring that the soil and groundwater around each tank was free of contamination. Pursuant to the CDP, Duke was to grade the site once all facilities and any oil-contaminated material were removed. SDG&E completed its remediation of the remaining contaminated soil within the north tank farm in February 2011 pursuant to a November 2007 Corrective Action Consent Agreement issued by DTSC.

Removal of the tank bottoms, the underlying engineered soils and residual contaminated soils left large pits in the ground surface where the tanks were originally located. These pits are shown in Figure 6. Southern cattails (*Typha domingensis*) subsequently began growing in one of the pit areas in the footprint of former tank 6. The area of these cattails is 663 square feet (approximately 0.02 acres). Otherwise, the pits remaining in the areas where tanks 4, 5, and 6 were located do not support aquatic vegetation. Dynegy has stated that all pits dry up in most years, although small amounts of water may persist in a few areas depending on the amount of rain during some years. The circular excavation areas under the base of the tanks and the soil remediation pits in the north tank farm are below the grade of the current containment area drains. Although the drains are now maintained open and the site is otherwise well drained, these low areas may collect rainfall from time to time within the individual tank containment cells. Grading in this area has never been completed and will be conducted as part of Dynegy's demolition project.

The land within the boundary of the north tank farm (Figure 6) has not been maintained as actively as the rest of the SBPP site, although it has been cleared of vegetation through most of the SBPP operational history. As a result of reduced maintenance some sparse vegetation has colonized these tank areas. Plant species observed in the north tank farm area include wild oat, red foxtail brome grass, Russian thistle, tocalote, tarragon, white tumbleweed, coyote bush (*Baccharis pilularis*), broom baccharis (*Baccharis sarothroides*), Canary Islands statice, Algerian sea lavender, and a few mulefat shrubs (*Baccharis salicifolia*). Most of the north tank farm area is barren ground. The vegetation that has colonized the north tank farm has greater cover than occurs on the rest of the SBPP site; however, it is still sparse and of low value to wildlife. This increased cover may favor ground squirrels and cottontail rabbits, but it is otherwise of little value to other mammals and birds.

The intake/discharge channels are open to the tidal waters of the San Diego Bay. The marine species found in the waters of San Diego Bay may occur within the waters of these channels. The intertidal perimeter of the intake/discharge channels is lined with riprap and does not support adjacent salt marsh vegetation. This riprap provides habitat for intertidal and subtidal marine species. There are three (3) intake structures within the intake channel. The intake structures are concrete with steel grates, and do not provide suitable substrates for most marine species. The bottom substrate of the intake/discharge channels is sand and mud, and provides habitat for benthic organisms similar to the substrates of the adjacent San Diego Bay.

There are areas of open water, salt marsh, and mudflats west of the SBPP in San Diego Bay. Coastal birds commonly use these areas to forage. Bird species commonly observed in these offsite areas include common sandpiper (*Actitis hypoleucos*), mallard,

(*Anas platyrhynchos*), great egret (*Ardea alba*) snowy egret (*Egretta thula*), great blue heron (*Ardea herodias*), and black necked stilt (*Himantopus mexicanus*).

Much of the area surrounding the SBPP site is under urban and industrial development (Figure 7). This development includes the cities of Chula Vista and National City to the south/southeast, east, and north. San Diego Bay runs along the west side of the SBPP site and the intertidal lands west of the site support salt marsh and mudflat habitats used by all species common to these habitats in the region. Salt ponds for Western Salt occur southwest of the site. The ponds themselves near the plant side are areas where salt is harvested and do not provide substantial habitat for marine related species. The berms of the salt ponds and areas on the peninsula/island separating the intake and outfall flows in San Diego Bay west of the site provide nesting habitat for California least tern (*Sterna antillarum browni*). The nesting areas are generally greater than 0.75 miles from the power block on the SBPP site. The nesting island is owned and managed by the San Diego Unified Port District. The California least tern forage in the waters of San Diego Bay, including the waters west of the SBPP. California least tern are Federal and State Endangered. They do not nest on the SBPP site.

American peregrine falcons (*Falco peregrinus anatum*) have been observed in the region in the past. The American peregrine falcon is a California Fully Protected species. They have been known to prey heavily upon chicks of California least terns in the vicinity of the SBPP and they are generally not encouraged in the local area by natural resource agencies. The SBPP currently provides convenient perching areas on the power plant and on ornamental trees on site for American peregrine falcon, as well as other raptors, allowing potential facilitation of predation on California least tern chicks.

Eastern Pacific green sea turtles (*Chelonia mydas*) are Federal Endangered species and have been observed in San Diego Bay and in the vicinity of the mouths of the SBPP intake and discharge channels. They have also been observed throughout San Diego Bay. Green sea turtles occur infrequently along the southern California coast, and have been reported as occasionally captured in coastal power plant intake bays from San Diego to north of Los Angeles.

Although many special management species, such as the Federal Threatened western snowy plover (*Charadrius alexandrinus nivosus*), occur in San Diego County and along the coastline, none have a high likelihood of occurring near the SBPP and none have been found inhabiting the SBPP site. There is no suitable habitat on site for these species.

3.2 IMPACTS

No adverse impacts on biological resources will result from the direct removal of the above-ground structures that include; the power block, buildings, and other material structures on the SBPP site because these areas are not habitat for biological resources in general. The greatest potential for impact on biological resources from such demolition work will be associated with demolition of the power block. Demolition by implosion will generate some noise and dust. Demolition by other means that lays down the power block will also result in some noise and dust when the structure is tipped down. The act of detonating explosives to implode a structure does not produce substantial noise at distance and it occurs through a series of small detonations occurring within a very short timeframe that produce a controlled collapse of the structure. The collapsing structure has the potential to generate dust from the impact of the falling structure on the ground surface. In the case of non-explosive laydown of the structure, there will still be some noise generated from the falling structure and the dust generation is expected to be similar to that from implosion.

Substantial adverse impacts from noise or dust have not been identified with similar implosions of power plants in California. Given the short duration of the explosive detonations and low yield charges used, no adverse impacts on native habitats in San Diego Bay are expected to result from implosion noise. No significant adverse impacts on nesting or foraging California least tern from noise are expected to result from either implosion or other manner of lay down of the power block. Other activities that may generate noise during demolition will be associated with equipment operation which is not expected to be greater than when the plant was in operation. Trucks and other equipment that will likely be used are not expected to result in adverse impacts on biological resources in the adjacent San Diego Bay and California least tern nesting area because of the distance from and lower levels of such noise sources.

Implosion of the power block or other means of laying down the power block may result in dust generation. The prevailing winds are from the west to the east, such that dust generated during implosion or other laydown of the power block should move to the east, away from San Diego Bay and its waters. Best management practices for dust control during this event will include use of water sprays to contain dust. Therefore, it is unlikely that dust from the implosion or other means of laydown will enter San Diego Bay or potentially adversely impact California least tern nesting sites or foraging areas. **No adverse impacts on San Diego Bay or biological resources using the bay, including California least tern or green sea turtles, are expected to result from dust.**

Removal and/or salvage of ornamental landscape plantings may occur within the above-ground demolition area adjacent to structures and buildings that may be demolished (Figure 6). Additionally, 13 large potted trees and shrubs may be removed,

along with 21 other large concrete “pots” that had prior plantings that are no longer present or growing. These ornamental plantings provide minimal habitat for wildlife and serve as attractions to potential avian predators that may prey upon California least terns. Therefore, removal of these ornamental plantings will not result in significant adverse impacts on biological resources on site and is expected to benefit California least tern by reducing risks from raptor predation of California least terns in the local vicinity.

The developed, unpaved yard and south tank farm do not provide vegetation habitat or substantial wildlife habitat under operational practices on site. Removal and/or salvage of the above-ground tanks in this area with additional activities associated with such removal will not result in significant adverse impacts on biological resources because no substantial biological habitat is provided in these areas and no substantial biological resources will be affected.

Telegraph Creek, the J Street Canal, and San Diego Bay, including the salt marsh and mudflat habitats west of the SBPP, will not be affected by the demolition of the above-ground structures. A Construction Stormwater Pollution Prevention Plan will be developed and implemented to ensure that best management practices will be performed to reduce the likelihood of adverse creation of run-off or turbidity and sedimentation in the San Diego Bay.

3.3 RECOMMENDED MITIGATION MEASURES

Although no substantial adverse impacts on biological resources are expected to result from this demolition project, several mitigation measures are recommended to assist in avoidance of adverse effects on biological resources. These measures are already part of the best management practices and plans for the project.

A. Dust Control Measures during power block implosion or laydown:

- a. Implosion or laydown of the power block should only occur if the prevailing winds are blowing from the general west to east (or other directions that would not result in dust being blown westward) to avoid wind generated dust deposition in San Diego Bay and biological habitats west of the SBPP.
- b. Water sprays should be provided to suppress dust generated during the implosion or laydown of the power block.

B. Implement the Construction SWPPP:

- a. The project's Construction SWPPP will contain Best Management Practices to control erosion and runoff that may occur on site during demolition. This measure should be implemented to avoid potential runoff or sedimentation in San Diego Bay, Telegraph Creek, or the J Street Canal.
- C. Removal/cutting of ornamental vegetation outside of the avian nesting season:
 - a. Removal/cutting of ornamental vegetation should occur between September 15 and the following March 15 of a given season to avoid nesting birds. Removal may occur at other times if a biologist qualified in bird and nest identification can document no nesting birds are present in the ornamental vegetation.

SECTION 4 CALIFORNIA COASTAL COMMISSION WETLANDS

Section 30121 of the California Coastal Act (2010) defines wetlands as: *Wetland means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, or fens.*

The California Coastal Commission Administrative Regulations (Section 13577 (b)) further defines wetlands as: *Wetlands are lands where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent or drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salt or other substance in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deepwater habitats.*

4.1 EXISTING CONDITIONS

The intertidal waters of San Diego Bay, the J Street Canal, and Telegraph Creek (Figures 6 and 7) meet the definition of Coastal Commission wetlands; however, these wetlands are outside of the impact area for the SBPP demolition project. San Diego Bay supports salt marsh habitat that grades from pickleweed (*Salicornia virginica*) and cordgrass (*Spartina foliosa*) dominated wetlands to high marsh wetlands dominated by alkali heath (*Frankenia salina*). However, these areas also occur beyond the perimeter fence and boundary of the SBPP and will not be affected by this demolition project.

The tidal waters in the intake and discharge channels include tidal and subtidal/deepwater habitats. The tidal fringe of riprap exclusive of the intake structures may be considered wetlands pursuant to the California Coastal Commission although the riprap itself is not a hydric soil and there are no hydrophytic plants in these channels. The subtidal waters in these channels are deepwater habitats.

The paved and unpaved portions of the developed power plant operations yard do not contain wetlands. The stormwater conveyance system in this developed yard is a structure consisting of ditches in uplands that conveys stormwater from upland areas ultimately to San Diego Bay, and is not a wetland.

The south tank farm consists of containment areas that are currently well drained. As discussed in Section 3 above, these engineered containment areas were operated to temporarily detain stormwater during rain events for inspection to ensure that no oil

contamination was present before releasing the detained stormwater to San Diego Bay. As a result of this temporary detention, there are still some remnants of detention operations, such as soil cracks that are not indicative of wetland hydrology because the containment areas have always been managed to release stormwater after rain events. These areas are currently managed with the drains open resulting in complete drainage of the site without temporary detention. No hydric soils were identified in these containment areas. The soils are high in salt content as a result of salt spray from San Diego Bay and the Western Salt Ponds, as well as potentially from original soil salt content from construction.

The containment areas in the south tank farm are primarily barren ground and are maintained as such by SBPP operations; however, some plants temporarily colonize these areas between maintenance, although they are not dominants and are very sparsely distributed. Three hydrophytic plants were observed in a few isolated areas within the containment areas: loosestrife (*Lythrum hyssopifolium*), rabbitfoot grass (*Polypogon monspeliensis*), and salt heliotrope (*Heliotropium curassavicum*). Loosestrife and rabbitfoot grass are ruderal species that are rapid colonizers of barren, disturbed moist soils without the need for soil inundation or saturation by water for their establishment. Salt heliotrope is a halophyte that also rapidly colonizes moist barren and disturbed soils (Nelson 1979). Roy and Mooney (1982) found that salt heliotrope may occur in dry soil according to consideration of soil water potential such as described by Taiz and Zeiger (1991). Salt heliotrope is often found in areas with high soil salt content that lack inundation or saturation of soils by water, is considered to be a weed in many places, and is not a strong indicator of wetlands (John Dixon, California Coastal Commission, personal communication 2002; and URS 2002). The temporary colonizing plants observed in the containment areas were primarily upland species, were also not dominant plants, and were sparsely distributed. These species include: white tumbleweed, five hook bassia, California filago, telegraph weed, and crystalline iceplant. These containment areas are fully developed areas that provide minimal habitat for wildlife. The containment areas are not considered to be wetlands because they are well drained and lack wetland hydrology.

The north tank farm is similar to the south tank farm in design and operation, with the exception of the presence of excavated soil remediation pits within the former tank containment areas and less regular maintenance of vegetation as described in Section 3, above. With the exception of the soil remediation pits in the tank containment areas, these containment areas are well drained and do not have wetland hydrology. The soil remediation pits are below the grade of existing drains in the containment areas and temporarily pond water during portions of the year. Hydric soils were not observed in most of the shallow to moderate depth pits, although hydric soils were found in several deeper pits that also had standing water present and/or showed signs of longer duration inundation. The soil remediation pits were generally free of vegetation except for one

small pit that is 663 square feet (approximately 0.02 acres) in area that contains southern cattails (Figure 6). The remainder of the north tank farm consists of either barren ground or sparse, patchy vegetation dominated by upland species. As described in Section 3 above, these containment areas do not provide substantial habitat for wildlife and were required to be graded under the prior CDP. These excavated pits within the north tank farm exhibit wetland indicators, as defined by the Coastal Commission. The area of the pits in the containment areas are 0.3 acres for tank 4, 0.3 acres for tank 5, and 0.4 acres for tank 6 for a total of 1.0 acre in the north tank farm.

4.2 IMPACTS

No impacts on wetlands or waters of San Diego Bay (exclusive of the intake and discharge channels for the SBPP), Telegraph Creek, or the J Street Canal will result from this demolition project. No impacts on wetlands will result from demolition activities in the paved and unpaved portions of the developed operations yard. No impacts on wetlands will result from demolition activities in the south tank farm.

4.3 MITIGATION

Although no substantial adverse impacts on wetlands are expected to result from this demolition project, several mitigation measures are recommended to assist in avoidance of adverse effects on biological resources. These measures are already part of the best management practices and plans for the project.

- A. The mitigation measures in Section 3.3, above, should be implemented to also protect wetlands and waters adjacent the SBPP site.

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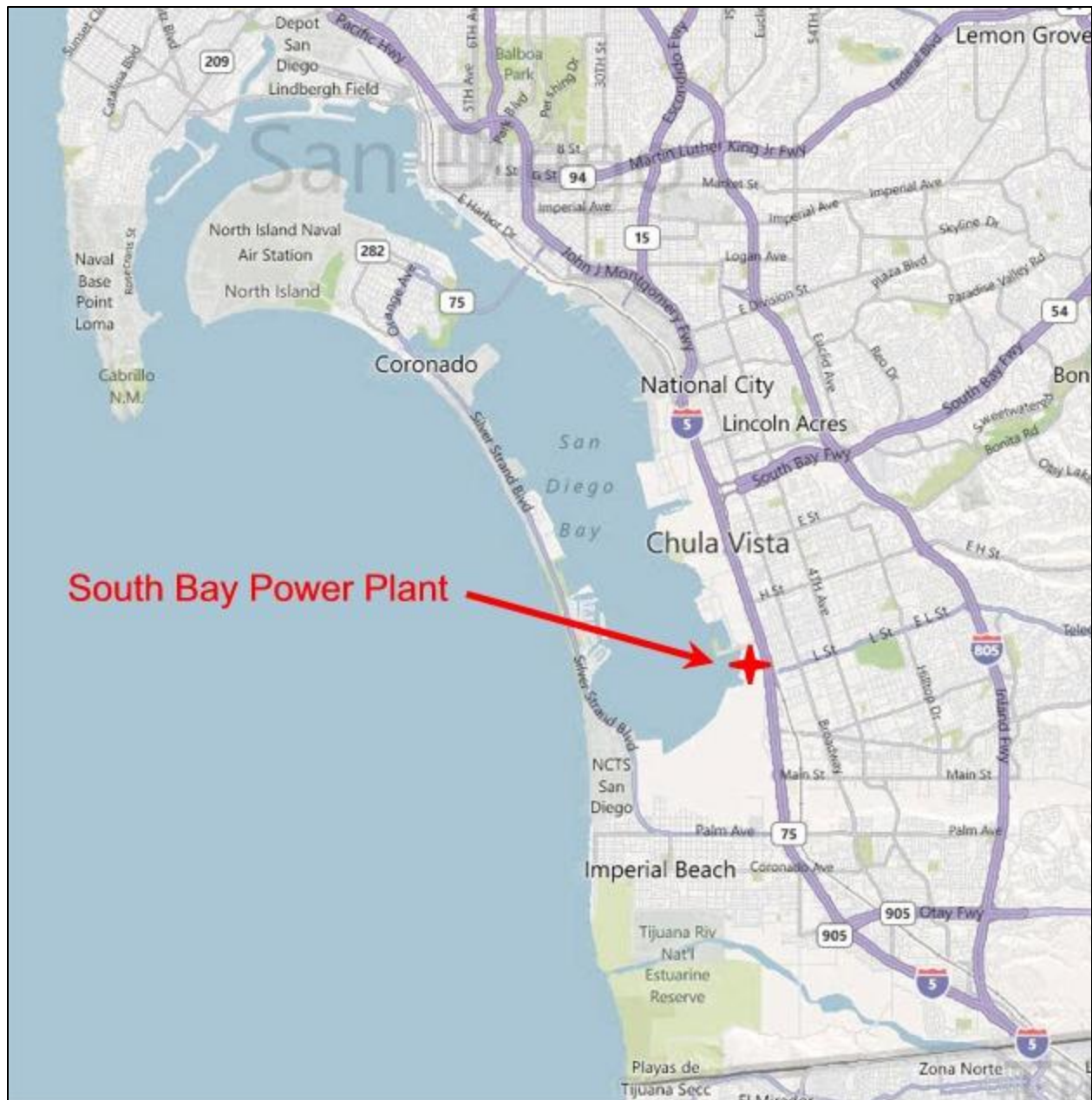


Figure 1. Regional location map for the South Bay Power Plant



Figure 3. Aerial photograph of the South Bay Power Plant Site and limits of demolition

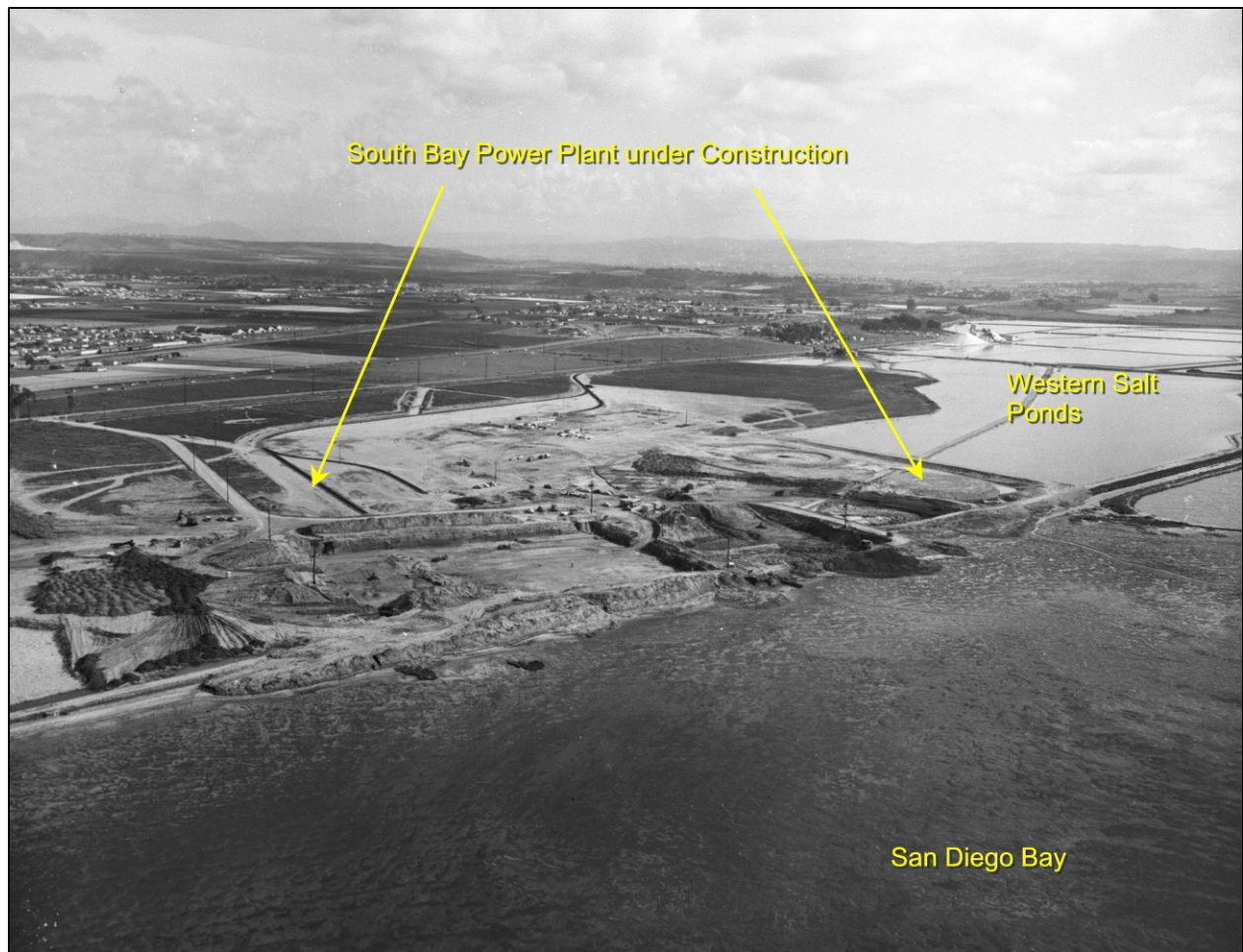


Figure 4. The South Bay Power Plant under construction on February 28, 1958 (view to southeast)

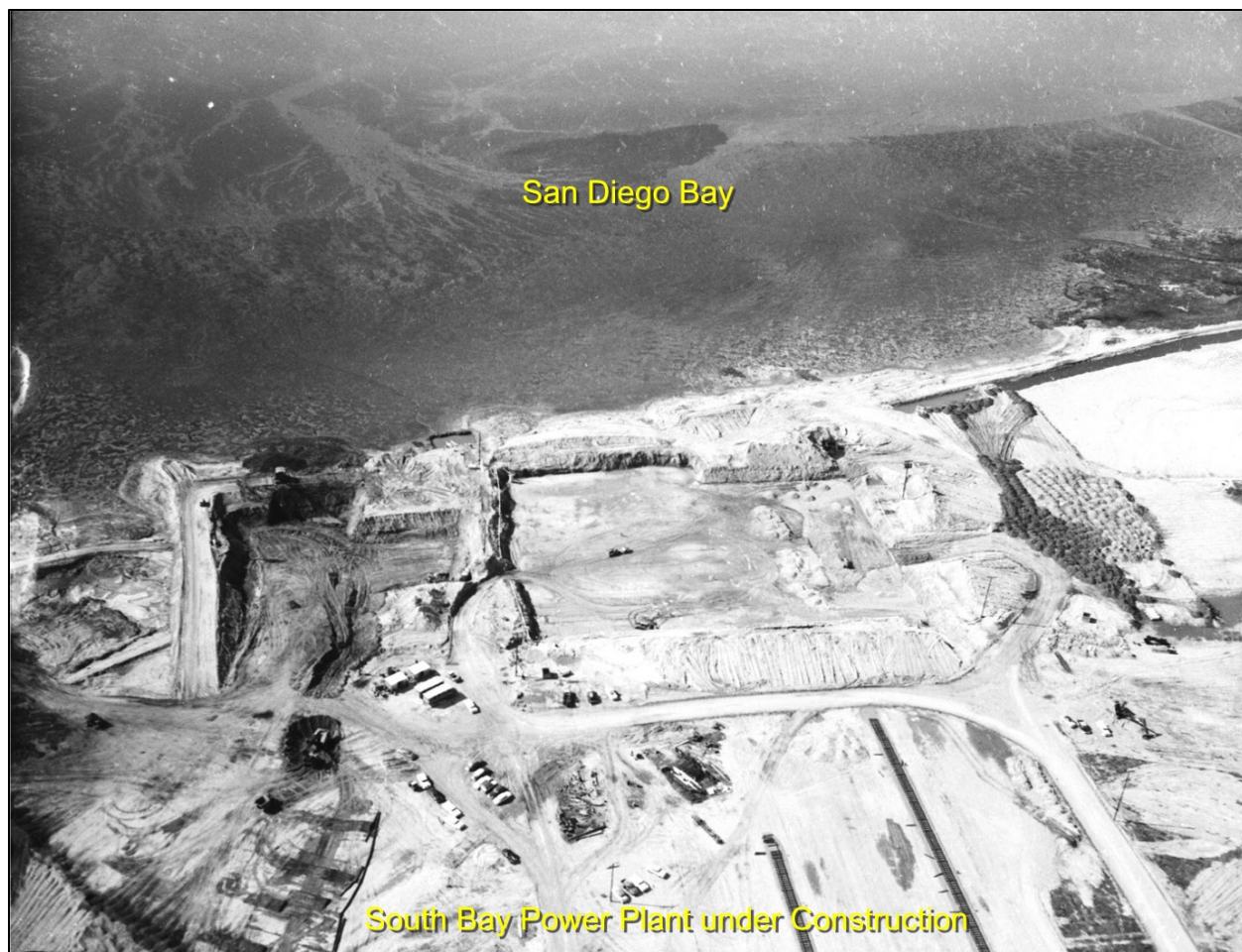


Figure 5. The South Bay Power Plant under construction on February 28, 1958 (view to west)

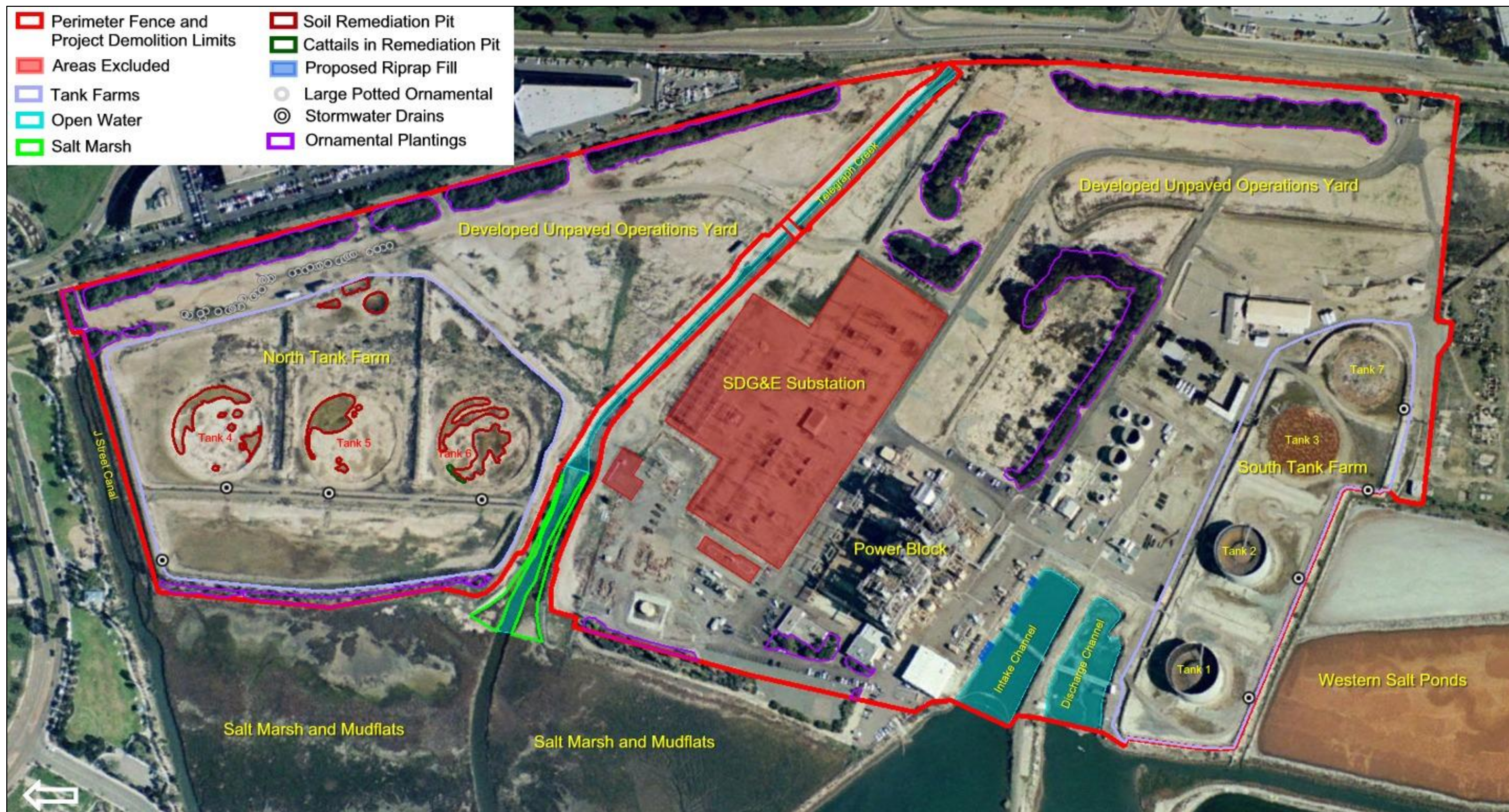


Figure 6. Project features and biological resources on site



Figure 7. Aerial photograph of the local region near the South Bay Power Plant



Figure 8. Large concrete potted shrubs and trees on north portion of site